



DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
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IN REPLY REFER TO

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November 23, 2004

Ms. Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section
USEPA Region 1
1 Congress Street, Suite 1100
Boston MA, 02114-2023

Dear Ms. Keckler:

SUBJECT: DRAFT AND DRAFT FINAL FIVE YEAR REVIEW REPORT, NAVAL STATION
NEWPORT, NEWPORT, RHODE ISLAND

The Navy's responses to EPA comments dated October 22, 2004 on the Draft Work Plan are provided as enclosure (1). Through informal discussions and e-mails, the EPA has indicated their agreement with these responses. By e-mail of November 22, 2004, the EPA provided comments on the Draft Final Report. These comments are identical to the comments EPA provided in their October 22, 2004 letter (the Navy issued the Draft Final Report prior to receiving EPA's October 22, 2004 letter). Accordingly, the attached responses will also serve as responses to the EPA comments dated November 22, 2004 on the Draft Final Report. RIDEM indicated they will not be providing any comments on the Five Year Review Report. Therefore, the Navy will proceed with preparing and issuing the Final Five Year Review Report.

If you have any questions, please do not hesitate to contact me at (610) 595-0567 extension 142.

Sincerely,

CURTIS A. FRYE, P.E.
Remedial Project Manager
By direction of the
Commanding Officer

Enclosure: 1. Navy Responses to Comments from USEPA on the Draft
Five Year Review, Naval Station Newport (Comments
of October 22, 2004 and November 22, 2004)

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**Responses to Comments from the U.S. Environmental Protection Agency
Draft and Draft Final Five Year Review Report
Comments Dated October 22, 2004 and November 22, 2004**

General Comment 2: The Navy response does not appear to interpret the EPA guidance on evaluating vapor intrusion to indoor air correctly. Consideration of the possibility of exposure by this pathway is not limited to "inhabited buildings" as indicated in the Navy response. The vapor intrusion pathway is also to be considered for future buildings.

The Navy may wish to consider an institutional control to prevent building of any kind (for commercial and residential) in the future if vapor intrusion is not evaluated. Otherwise, if building is a possibility, the pathway should be evaluated. By following the draft guidance and in light of the detections at the site, it is likely that a qualitative evaluation of VOCs detections and screening is all that would be required.

Response: As noted previously, the Navy has no plans to develop either the McAllister Point Landfill or Tanks 53 and 56 at Tank Farm 5 for residential use in the future. However, should the current land use change at either site to a future use including "inhabited buildings," an evaluation will be completed in accordance with EPA's Subsurface Vapor Intrusion Guidance to address EPA's concerns about vapor intrusion to indoor air.

The following text will be added as a second paragraph in Sections 2.7 and 3.7, Recommendations and Required Actions, of the final five-year review report.

"If there is a future change in land use of the site that includes buildings meeting the definition of "inhabited buildings" in EPA's Subsurface Vapor Intrusion Guidance, an evaluation of vapor intrusion to indoor air will be completed in accordance with the EPA guidance."

General Comment 4: The response indicates that the Navy will evaluate reuse options (golf course construction) only after investigations and required follow up actions are completed. In order to ensure that clean up options sufficiently protect future site users, it seems prudent to evaluate risk to probable future exposure pathways at the time cleanup goals are selected.

Response: The process of selecting cleanup goals for Tanks Farms 1 through 5, under both the CERCLA Program and RIDEM UST Program, will indeed consider future exposure pathways. However, that process is separate from the five-year review process. Each of the sites and study areas addressed in Section 4 of the draft final five-year review report concludes with a statement that if a remedial action is selected, the protectiveness of that remedy will be reviewed in subsequent five-year reviews.

The following sentence will be added to the above-mentioned concluding paragraph in Sections 4.2, 4.5, 4.6, 4.7, and 4.8:

"The remedial action selection process will evaluate risk from future recreational uses of the site, such as use for a golf course, in establishing cleanup goals for the site."

Specific Comment 15: The Navy response does not address EPA's concern expressed in the original comment. The sentence in question, "However none were found, and it was determined that the oil was likely immobile and degrading," should be deleted from page 4-3. The sentence does not adequately portray the findings of the 1996 report and is contrary to data within the 2001 RI report.

Response: The sentence will be deleted from the final report.

Enclosure (1)